


December 14, 2022

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

The parties shall file a joint letter regarding deposition scheduling of the deposition of Maria Vasquez and any further deponents, as contemplated in the endorsed letter, when any such depositions are scheduled. So Ordered.

Dated: December 15, 2022
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Shinano Kenshi Corp. et al. v. Honeywell Int'l Inc.*, Case No. 22 CV 3704 (LGS)

Dear Judge Schofield:

Pursuant to the Court's Order dated December 12, 2022 (Dkt. No. 39), Plaintiffs Shinano Kenshi Corporation and Shinano Kenshi Co., Ltd. (collectively referred to as "Plaintiff") and Defendant Honeywell International Inc. ("Defendant"), respectfully submit this joint letter to the Court regarding deposition scheduling and document production.

I. Depositions

On December 12, 2022, the Court ordered the parties to provide a firm date for the deposition of Maria Adriana Vazquez. Dkt. No. 39. Defendant maintains its intention to represent Ms. Vazquez, but, despite reasonable efforts, has been unable to contact her. On December 14, 2022, Defendant provided Plaintiff with Ms. Vazquez's last known contact information and Plaintiff will also endeavor to get in touch with Ms. Vazquez. The parties will update the court with a firm date for the deposition as soon as either party ascertains Ms. Vazquez's availability.

In addition to the depositions identified in the parties' joint letter (Dkt. No. 38) and incorporated by the court (Dkt. Nos. 39, 40), the parties reserve the right to take additional depositions to the extent additional relevant personnel are identified in the course of reviewing the ongoing document productions or taking presently scheduled depositions. Should this be necessary, the parties will promptly update the Court.

II. Document Production

The parties continue to make progress with their document production. Both parties anticipate completing their document production on or before the January 6, 2023 deadline. Additionally, the parties have met and conferred pursuant to the court's December 12, 2022 order (Dkt. No. 39) that certain categories of information are relevant to this action and discussed burden concerns raised by Defendant.

Respectfully Submitted,

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